

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814
(916) 324-1807



JAN 4 1985

December 24, 1984

LEGISLATIVE DEPARTMENT

Mr. Anthony B. Cavender
Pennzoil Company
P.O. Box 2967
Houston, TX 77252-2967

Dear Mr. Cavender:

This is in response to your August 1, 1984 letter to us requesting a declassification of the clarifier waste and grease pit waste generated at your California facility at 3430 E. 26th Street, Vernon, California 90023.

Based on the completed Waste Classification Form, laboratory reports from Smith Emery Company (dated May 7, and June 7, 1984) and Brown and Caldwell (Log Nos. E84-9-226-182, dated 10/8/84), and other information obtained from phone conversations with Ms. Usha Mehra (December 19, 1984) of your firm and provided in Ms. Mehra's October 16, 1984 letter, the Department has decided that the above-mentioned wastes are nonhazardous pursuant to Section 66305, Title 22, California Administrative Code (CAC). In the event the waste(s) changes so that the submitted information no longer adequately characterizes the waste(s), and the waste(s) are hazardous, the waste(s) shall be managed as hazardous according to the provisions of Chapter 30, Title 22, CAC.

The disposal and management of the wastes remains subject to the requirements of the Regional Water Quality Control Board and the local authorities.

Any questions regarding the classification of your waste may be directed to Bill Quan of my staff at (916) 324-3754.

Sincerely,

A handwritten signature in cursive script that reads 'David J. Leu'.

David J. Leu, Ph.D., Chief
Alternative Technology & Policy
Development Section
Toxic Substances Control Division

cc: see next page

PQS2 02102

December 24, 1984

cc: Ms. Usha Mehra
Pennzoil Company
P.O. Box 2967
Houston, TX 77252-2967

Mr. Angelo Bellomo, Chief
Southern California Section
Toxic Substances Control Division
107 South Broadway, Room 7128
Los Angeles, CA 90012

Los Angeles County Health Department
313 North Figueroa Street
Los Angeles, CA 90012

Los Angeles Regional Water
Quality Control Board
107 South Broadway, Room 4027
Los Angeles, CA 90012

~~T. Vance~~
2. Vernon, CA - Solid Waste File



PENNZOIL PLACE • P. O. BOX 2967 • HOUSTON, TEXAS 77252-2967 • (713) 546-4000

OCT 17 1984

October 16, 1984

LETTER OF TRANSMITTAL

Dr. Stan Lau
Hazardous Waste Division
1219 K Street
2nd Floor
Sacramento, California 95814

Re: Addendum to Pennzoil's Waste Classification Form for
Pennzoil Products Company, Vernon CA - Submitted on
August 1, 1984

Dear Dr. Lau:

As per our conversation on September 25, 1984, I am sending you additional information on Pennzoil Products Company's Vernon facility solid wastes. This information supplements our initial notification of August 1, 1984 and includes aquatic toxicity of the two wastes, a material safety data sheet (MSDS) on the floor cleaner used in the plant, and some general information about the greases manufactured at the Vernon plant.

The aquatic toxicity results indicate a 96 hr toxicity limit of 0.8 g/liter for both the wastes. As you know, under the guidelines of the California Assessment Manual, these wastes therefore cannot be considered hazardous. The toxicity tests were run by the Brown and Caldwell Laboratory of Emeryville, California. Attachment #1 contains the test results submitted by Brown and Caldwell.

Attachment #2 is the MSDS for the floor cleaner manufactured by Chemrite Corporation and used at the Vernon plant. The cleaner is diluted with water for use in a floor scrubber to remove any greases from the building floor.

The greases manufactured at the Vernon plant are primarily industrial lubricants. They are petroleum based products with a small fraction of metallic additives. As indicated by the analysis of the overall toxicity of the wastes from the grease pit and clarifier, these greases inherently exhibit slight to no toxicity.

In view of the urgent necessity to arrange for the safe and expeditious disposal of the solid waste accumulating at Vernon,

PQS2 02104

Dr. Stan Lau
Hazardous Waste Division
October 16, 1984
Page 2

we are requesting a prompt response to our supplemental waste assessment notification. Should you have any questions, please call me at 713/546-8126.

Sincerely,



Usha Mehra
Environmental Advisor

UM/mm

Attachments

cc: James Waldrip
Pennzoil Products Co.
1630 West Olympic Blvd.
Los Angeles, CA 90015

bcc: A. B. Cavender w/o attachments
J. W. Graves " "
H. E. Sortor " "
File: Pennzoil Products-Vernon w/attachments

PQS2 02105